



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Elissa B. Jacobs
Special Federal Litigation
(212) 356-3540
(212) 788-9776 (fax)
ejacobs@law.nyc.gov

September 8, 2015

By ECF

Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ameir Stewart, et al. v. City of New York, et al.,
1:14-cv-02854-RJD-RML

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of The City of New York, representing the defendant The City of New York in this action. I am writing to amend the request, submitted by plaintiffs' counsel, David Thomson on August 25, 2015, for an extension of discovery until October 30, 2015. After discussion among counsel, Mr. Thompson requested that discovery be extended until October 15, 2015, a request which has not yet been ruled upon. The parties had scheduled dates for depositions in late September, including three dates during the week of September 28th. However, since that letter, I have learned that, due to the Pope's visit and the U.N. General Assembly, the NYPD has requested that officers not be scheduled for depositions unless absolutely necessary. Therefore, defendants are requesting that discovery be extended until October 30, 2015, not October 15, 2015 as was earlier requested. Plaintiffs' counsel consents to this request.

Thank you for your attention to this matter.

Respectfully submitted,

/s

Elissa B. Jacobs

Honorable Judge Levy
Stewart v. NYC, et al.
September 8, 2015
Page 2

cc: David Thompson Esq.
Attorney for Plaintiffs

By ECF